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May 23rd, 2024

To: Hon. Lorna G. Schofield
United States District Judge
40 Foley Square
New York, NY 10007
via ECF

Re: Response to Order

Dear Judge Schofield:

In response to the Court's order issued May 20th, 2024, requesting thoughts on whether the denial of Plaintiff's license application confers standing, Plaintiff herein responds.

It is Plaintiff's continued position that there was *already* standing, before denial, because denial of the application was required by state law; *i.e.*, waiting for denial would be futile. *Libertarian Party of Erie Cnty. v. Cuomo*, 970 F.3d 106, 116 (2nd Cir. 2020), *abrogated on other grounds by Bruen*, 142 S. Ct. 2111 (2022). Plaintiff does not claim that a change in circumstance has conferred standing. However, the denial letter does make clear what Plaintiff has stated all along: that denial was mandatory under state law.

Respectfully,

*/s/*Jonathan Corbett

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